

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

In re: Linda R. Sosnowski, Debtor.	Chapter 13 Case No. 18-55233-mbm Hon. Marci B. McIvor
---	---

**US BANK TRUST NATIONAL ASSOCIATION AS TRUSTEE OF THE
CHALET SERIES IV TRUST’S OBJECTIONS TO CONFIRMATION OF
DEBTOR’S PROPOSED PLAN**

PLEASE TAKE NOTICE that secured Creditor, US Bank Trust National Association as trustee of the Chalet Series IV Trust objects to the Debtor’s proposed Chapter 13 Plan for the following reasons:

1. Shellpoint holds the first Mortgage on the property located at 34024 Aztec Drive, Westland, MI 48185.
2. Debtors’ proposed Chapter 13 Plan provides for monthly plan payments in the amount of \$1,137.00.
3. Debtors’ Chapter 13 Plan provides for an estimated arrears of \$44,105.39.
4. The Debtor’s Chapter 13 Plan specifically provides that the Debtor will obtain a mortgage modification which will resolve any existing mortgage arrearage.
5. That the Debtor’s Loan Modification as to the above referenced real property that was subsequently denied by Creditor.
6. Without an increase in the monthly payments from the Debtors, the Plan is infeasible.
7. For the above stated reasons, Creditor objects to confirmation of Debtor’s proposed Plan.

THEREFORE, US Bank Trust National Association as trustee of the Chalet Series IV Trust requests that Debtor's proposed Chapter 13 Plan be amended to provide for the above stated objections.

FABRIZIO & BROOK, P.C.

Dated: May 31, 2019

/s/ Panayiotis D. Marselis
Panayiotis D. Marselis (P66572)
Attorney for Creditor
700 Tower Drive, Ste 510
Troy, MI 48098
(248) 362-2600
bankruptcy@fabriziobrook.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

In re: Linda R. Sosnowski, Debtor.	Chapter 13 Case No. 18-55233-mbm Hon. Marci B. McIvor
---	---

PROOF OF SERVICE

Adam Harvey says that on May 31, 2019, I served a copy of the Objection to Confirmation on behalf of US Bank Trust National Association as trustee of the Chalet Series IV Trust, upon the following parties either electronically, or by depositing in the U.S. Mail, postage prepaid

Charles J. Schneider
39319 Plymouth Rd. Suite 1
Livonia, MI 48150

David Wm Ruskin
26555 Evergreen Rd Ste 1100
Southfield, MI 48076-4251

/s/ Adam Harvey
Adam Harvey
700 Tower Drive, Suite 510
Troy, MI 48098
(248) 362-2600
bankruptcy@fabriziobrook.com